Emissions Inventory Tracking System (EMIT): Title V and GPLPE Compliance Reporting

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Presentation Outline

- ➤ Project Objective
- ► E-Reporting System Development
- > Electronic Reporting Benefits
- Electronic Reporting Capabilities & Features
- ➤ Electronic Reporting Demonstration
- ➤ What's Next?
- Questions and Comments

EMIT eForm Project Objective

> Provide the ability to submit Title V or GPLPE Compliance forms to DEEP electronically (eForm).

The forms include:

- Title V Annual Compliance Certification
- Title V Semi-Annual Monitoring Report
- Title V Prompt Deviation Report
- GPLPE Annual Compliance Certification
- GPLPE Annual Emissions Summary
- GPLPE Notification of Exceedance Report

E-Reporting System Development

- Electronic reporting developed in response to, and in conjunction with business needs
 - System designed to benefit the regulated community, Department and other stakeholders
 - Efficiently utilize resources and reduce burden by expanding the capabilities of an existing system rather than creating a separate system
 - Eliminates waste (paperless, no filing, eases record retention burden)

E-Reporting System Development

- Utilized input and feedback from the regulated community during system development
 - Group of external users tested the system during development;
 - Positive feedback from users:
 - "Last year the Bureau of Air Management introduced EMIT, the electronic application for electronically reporting facility emissions. This application benefited both the Bureau and the regulated community in areas of efficiency, data validation, and database management and retrieval in its replacement of the outdated paper process. Since that time the Bureau has increased the ways in which EMIT can be used to now include compliance reporting for both large, Title V sources and for smaller, general-permit emitters. This continued development and implementation of e-government is a win-win for all affected stakeholders." (October, 2011)

Robert Silvestri, Environmental Operations Leader PSEG Power Connecticut LLC

Electronic Reporting Benefits

- > Electronic reporting saves time, resources and assists facilities with achieving compliance.
 - No additional cost for mailing or delivery
 - Send out reminder notification that reports are due
 - Date submitted is the same as date received by the Department
 - Instant feedback from automatic error and completeness checks
 - Quicker compliance determinations and response from the Department
 - Automated tracking of submitted reports
 - Courtesy follow-up on delinquent reports

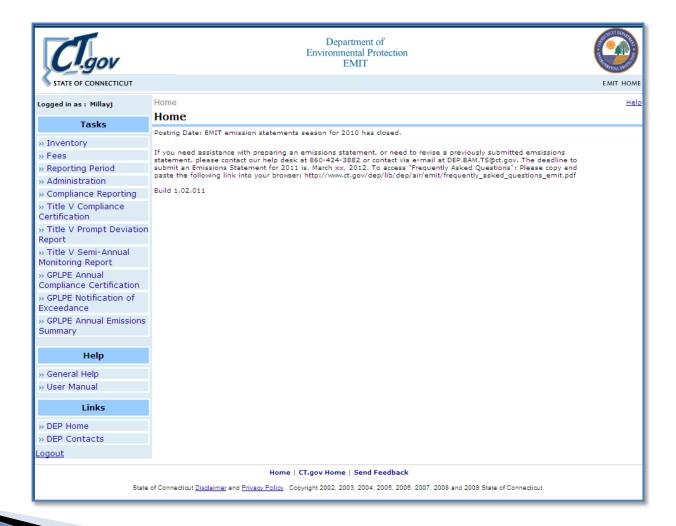
EMIT System Capabilities & Features

- > Auto-population of premises, ownership, contact, and permit information on all of the forms
- Compliance reporting period built-in logic
- Ability to attach documents to eForm submittals
 - 22a-174-19a Certification, 22a-174-38 Annual Report, Signatory Authorization Form, Federal MACT Reports
 - Title V Annual Compliance Certification Terms & Conditions
 - Attachments are required to be submitted in PDF format
- Report Verification and Security
 - Advance notification reports are due
 - Report completeness verification
 - Report Preview
 - User Authentication and Signatory Statement Verification

EMIT System Capabilities & Features

- > Provide DEEP the ability to more effectively and efficiently communicate with Permittees:
 - Compliance Report Reminder (March 1st & September 1st)
 - Email confirmation of Compliance Report Receipt
- Draft or partially completed reports can be saved for completion and submittal at a later date
- Ability to modify and re-submit past compliance reports created in EMIT

EMIT eForm System Demonstration



What's Next?

- > To access EMIT each permittee will need to obtain a user account
 - Two user roles are available for permittees (Editor and Submitter)
 - Companies with multiple permits/locations will require separate user accounts for each premise
- WebEx Training is being developed for Title V and GPLPE users.

What's Next: Redesign & Standardization of Title V Compliance Certificaction Form

- LEAN evaluation of the Major Source PIQ Inspection program and E-Reporting project identified potential benefits of a standardized Title V Permit format;
- Currently:
 - Each source creates their own Compliance Certification;
 - DEEP staff create PIQ inspection "checklist" for each source prior to inspection to ensure all terms and conditions are evaluated;
- Future State:
 - Standardize Title V Permit format;
 - Easily convert Title V permit into Title V Compliance Certification document and or PIQ Inspection checklist (all conditions listed as they appear in the permit);
 - Standardized Compliance Certification document will be provided to source at time of permit issuance and relieve source of the burden of developing their own document.

Questions or Comments?



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